

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>A.C., an individual;</b>	:	<b>Case No. 2:19-cv-4965</b>
	:	
<b>Plaintiff,</b>	:	<b>Judge: Marbley</b>
	:	
<b>v.</b>	:	<b>Magistrate: Deavers</b>
	:	<b>Related Case Nos.: 2:19-cv-00755</b>
<b>RED ROOF INNS, INC.; WYNDHAM HOTELS AND RESORTS, INC; AND CHOICE HOTELS INTERNATIONAL, INC.;</b>	:	<b>2:19-cv-00849</b>
	:	
	:	<b><u>(Filed electronically)</u></b>
	:	
<b>Defendants.</b>	:	

**DEFENDANT, RED ROOF INNS, INC.’S ANSWER TO PLAINTIFF’S FIRST  
AMENDED COMPLAINT**

Defendant, Red Roof Inns, Inc. (hereinafter “RRI”), by and through counsel, for its Answer to Plaintiff’s First Amended Complaint states as follows:

1. The allegations contained in paragraph 1 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 1 of the First Amended Complaint.

2. As to RRI, RRI denies the allegations contained in paragraph 2 of the Complaint. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 2 of the First Amended Complaint.

3. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 3 of the First Amended Complaint.

4. RRI denies any sex trafficking occurred in its hotels, or that it knowingly profited from any illicit activities. In further responding, RRI does not have sufficient knowledge or

information to either admit or deny the remaining allegations contained in paragraph 4 of the First Amended Complaint.

5. As to RRI, RRI denies the allegations contained in paragraph 5 of Plaintiff's First Amended Complaint.

6. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 6 of the First Amended Complaint.

7. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 7 of the First Amended Complaint.

8. RRI denies any sex trafficking occurred in its hotels, or that it knowingly profited from any illicit activities. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 8 of the First Amended Complaint.

9. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 9 of the First Amended Complaint.

10. RRI denies the allegations contained in paragraph 10 of the First Amended Complaint.

11. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the First Amended Complaint and, therefore, denies the same.

12. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of Plaintiff's First Amended Complaint and, therefore, denies the same.

13. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of Plaintiff's First Amended Complaint and, therefore, denies the same.

14. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of Plaintiff's First Amended Complaint and, therefore, denies the same.

15. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of Plaintiff's First Amended Complaint and, therefore, denies the same.

16. RRI denies the allegations contained in paragraph 16 of Plaintiff's First Amended Complaint.

17. RRI denies the allegations contained in paragraph 17 of Plaintiff's First Amended Complaint.

18. The allegations contained in paragraph 18 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 18 of Plaintiff's First Amended Complaint.

19. The allegations contained in paragraph 19 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 19 of Plaintiff's First Amended Complaint.

20. The allegations contained in paragraph 20 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 20 of Plaintiff's First Amended Complaint.

21. The allegations contained in paragraph 21 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 21 of Plaintiff's First Amended Complaint.

22. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 22 of the First Amended Complaint.

23. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 23 of the First Amended Complaint.

24. RRI denies any sex trafficking occurred in its hotels, or that it knowingly profited from any illicit activities. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 24 of the First Amended Complaint.

25. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 25 of the First Amended Complaint.

26. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 26 of the First Amended Complaint.

27. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 27 of the First Amended Complaint.

28. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 28 of the First Amended Complaint.

29. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 29 of the First Amended Complaint.

30. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 30 of the First Amended Complaint.

31. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 31 of the First Amended Complaint.

32. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 32 of the First Amended Complaint.

33. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 33 of the First Amended Complaint.

34. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 34 of the First Amended Complaint.

35. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 35 of the First Amended Complaint.

36. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 36 of the First Amended Complaint.

37. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 37 of the First Amended Complaint.

38. The allegations contained in paragraph 38 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 38 of the First Amended Complaint.

39. The allegations contained in paragraph 39 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 39 of the First Amended Complaint.

40. The allegations contained in paragraph 40 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or

information to either admit or deny the allegations contained in paragraph 40 of the First Amended Complaint.

41. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 41 of the First Amended Complaint.

42. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 42 of the First Amended Complaint.

43. The allegations contained in paragraph 43 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 43 of the First Amended Complaint.

44. The allegations contained in paragraph 44 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 44 of the First Amended Complaint.

45. The allegations contained in paragraph 45 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 45 of the First Amended Complaint.

46. The allegations contained in paragraph 46 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or

information to either admit or deny the allegations contained in paragraph 46 of the First Amended Complaint.

47. The allegations contained in paragraph 47 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 47 of the First Amended Complaint.

48. RRI denies the allegations contained in paragraph 48(a). RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 48 of the First Amended Complaint.

49. The allegations contained in paragraph 49 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 49 of the First Amended Complaint.

50. As to RRI, RRI denies the allegations contained in paragraph 50 of the First Amended Complaint.

51. RRI denies the allegations contained in paragraph 51 of the First Amended Complaint and all of its subparts.

52. The allegations contained in paragraph 52 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the allegations contained in paragraph 52 of the First Amended Complaint.

53. The allegations contained in paragraph 53 of the First Amended Complaint are not directed at RRI. In further responding, RRI does not have sufficient knowledge or



information to either admit or deny the allegations contained in paragraph 53 of the First Amended Complaint.

54. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 54 of the First Amended Complaint.

55. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the First Amended Complaint and, therefore, denies the same.

56. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 54 of the First Amended Complaint.

57. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of the First Amended Complaint and, therefore, denies the same.

58. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the First Amended Complaint and, therefore, denies the same.

59. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the First Amended Complaint and, therefore, denies the same.

60. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the First Amended Complaint and, therefore, denies the same.

61. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the First Amended Complaint and, therefore, denies the same.

62. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 62 of the First Amended Complaint.

63. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 63 of the First Amended Complaint.

64. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the First Amended Complaint and, therefore, denies the same.

65. As to RRI, RRI denies the allegations contained in paragraph 65 of the First Amended Complaint.

66. As to RRI, RRI denies the allegations contained in paragraph 66 of the First Amended Complaint.

67. As to RRI, RRI denies the allegations contained in paragraph 67 of the First Amended Complaint.

68. As to RRI, RRI denies the allegations contained in paragraph 68 of the First Amended Complaint.

69. As to RRI, RRI denies the allegations contained in paragraph 69 of the First Amended Complaint.

70. RRI denies the allegations contained in paragraph 70 of the First Amended Complaint.

71. RRI denies the allegations contained in paragraph 71 of the First Amended Complaint.

72. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the First Amended Complaint and, therefore, denies the same.

73. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the First Amended Complaint and, therefore, denies the same.

74. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the First Amended Complaint and, therefore, denies the same.

75. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the First Amended Complaint and, therefore, denies the same.

76. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of the First Amended Complaint and, therefore, denies the same.

77. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 77 of the First Amended Complaint.

78. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI does not have sufficient knowledge or information to either admit or deny the remaining allegations contained in paragraph 78 of the First Amended Complaint.

79. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the First Amended Complaint and, therefore, denies the same.

80. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the First Amended Complaint and, therefore, denies the same.

81. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the First Amended Complaint and, therefore, denies the same.

82. As to RRI, RRI denies the allegations contained in paragraph 82 of the First Amended Complaint, but is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 82 of the First Amended Complaint.

83. As to RRI, RRI denies the allegations contained in paragraph 83 of the First Amended Complaint.

84. As to RRI, RRI denies the allegations contained in paragraph 84 of the First Amended Complaint.

85. As to RRI, RRI denies the allegations contained in paragraph 85 of the First Amended Complaint.

86. As to RRI, RRI denies the allegations contained in paragraph 86 of the First Amended Complaint.

87. As to RRI, RRI denies the allegations contained in paragraph 87 of the First Amended Complaint.

88. As to RRI, RRI denies the allegations contained in paragraph 88 of the First Amended Complaint.

89. As to RRI, RRI denies the allegations contained in paragraph 89 of the First Amended Complaint.

90. As to RRI, RRI denies the allegations contained in paragraph 90 of the First Amended Complaint.

91. As to RRI, RRI denies the allegations contained in paragraph 91 of the First Amended Complaint.

92. As to RRI, RRI denies the allegations contained in paragraph 92 of the First Amended Complaint.

93. As to RRI, RRI denies the allegations contained in paragraph 93 of the First Amended Complaint.

94. As to RRI, RRI denies the allegations contained in paragraph 94 of the First Amended Complaint.

95. As to RRI, RRI denies the allegations contained in paragraph 95 of the First Amended Complaint.

96. As to RRI, RRI denies the allegations contained in paragraph 96 of the First Amended Complaint.

## **CAUSES OF ACTION**

### **A. COUNT ONE – 18 U.S.C. §1595 (“TVPRA”)**

97. In response to the allegations contained in paragraph 97 of the First Amended Complaint, RRI incorporates its previous responses as if fully restated herein.

98. As to RRI, RRI denies the allegations contained in paragraph 97 of Plaintiff’s First Amended Complaint.

99. As to RRI, RRI denies the allegations contained in paragraph 98 of Plaintiff’s First Amended Complaint.

100. As to RRI, RRI denies the allegations contained in paragraph 99 of Plaintiff’s First Amended Complaint.

101. As to RRI, RRI denies the allegations contained in paragraph 100 of Plaintiff’s First Amended Complaint.

## **AFFIRMATIVE DEFENSES**

### **FIRST DEFENSE**

102. Plaintiff’s First Amended Complaint fails to state a claim against RRI upon which relief can be granted.

### **SECOND DEFENSE**

103. This Court lacks personal jurisdiction over RRI.

### **THIRD DEFENSE**

104. Venue is improper.

### **FOURTH DEFENSE**

105. This Court lacks subject matter jurisdiction over this matter.

**FIFTH DEFENSE**

106. Plaintiff's claims are or may be barred by the applicable statute of limitations.

**SIXTH DEFENSE**

107. Plaintiff's First Amended Complaint may be barred by the doctrine of res judicata and/or collateral estoppel.

**SEVENTH DEFENSE**

108. Plaintiff's claims of damages or liability are barred in whole or in part by her own failure to mitigate such damages.

**EIGHTH DEFENSE**

109. Plaintiff's claims are barred by a doctrine of estoppel, waiver, release, fraud, unclean hands and/or laches.

**NINTH DEFENSE**

110. The losses, if any, sustained by the Plaintiff were the result of conduct of persons or entities over whom RRI has no control or responsibility, and for whose conduct RRI is thus not liable.

**TENTH DEFENSE**

111. Plaintiff's claims against RRI are barred because there is no causal connection between any alleged act, error, or omission by RRI and the Plaintiff's alleged damages.

**ELEVENTH DEFENSE**

112. RRI denies any allegations set forth in Plaintiff's First Amended Complaint that are not specifically admitted herein.

#### **TWELFTH DEFENSE**

113. Plaintiff's alleged damages were caused by a superseding, intervening act, which was beyond the knowledge or control of RRI.

#### **THIRTEENTH DEFENSE**

114. RRI is entitled to apportionment of liability to other parties and non-parties to this action pursuant to Ohio Revised Code 2307.23.

#### **FOURTEENTH DEFENSE**

115. RRI respectfully reserves the right to amend its Answer to assert other affirmative defenses, claims, and defense as may become available or apparent during the course of discovery.

#### **FIFTEENTH DEFENSE**

116. Plaintiff has failed to join all necessary parties for just adjudication pursuant to Rule 19.

#### **REQUESTS FOR RELIEF**

WHEREFORE, Red Roof Inns, Inc. respectfully requests a Judgment in its favor as follows:

- A. For a trial by jury;
- B. Dismissal of Plaintiff's First Amended Complaint;
- C. Awarding attorneys' fees and costs taxed against Defendant as allowable by law;  
and
- D. For such other and further relief as this Court may deem just and appropriate.



Respectfully submitted,

/s/ Katherine L. Kennedy

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*Attorney for Defendant,*  
*Red Roof Inns, Inc.*

**JURY DEMAND**

A trial composed of the maximum number of jurors is hereby requested.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2020, I electronically filed a copy of the foregoing motion with the Court's ECF system, thereby serving counsel of record.

/s/ Katherine L. Kennedy

Katherine L. Kennedy (0079566)